

IN The United States District Court
For the Western District of Pennsylvania

Christopher Irwin,) CIVIL ACTION
PLAINTIFF) NO. 04-246, ERIE

Chantiers Twp. Police Dept.)
ET AL. DEFENDANTS)

U.S. DISTRICT CLERK
CLERK
COMMISSIONER

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Plaintiff's Response To Report and Recommendation

1 Plaintiff's claims should be tolled while he was incarcerated due to his injuries and disability, plaintiff cannot comprehend what he is reading, and has mental health issues, and needs a lawyer to properly litigate his claims. ALSO (W.C.C.F.) plaintiff did not have access to proper legal material, Washington County Correctional Facility, only lets inmates use law material 1 to 2 hours a week and that time is for ALL inmates together, we do not have that much time each.

Plaintiff's claims should be tolled due to a continuing wrong that was ongoing at (W.C.C.F) that his medical treatment and therapy denial continued until his release.

2 Plaintiff needs counsel to represent him so it would be even and I would be able to get the facts explained right and to add legal claims for Fourth Amendment and mental anguish. And to file paper work properly.

3 Plaintiff would like a jury trial in this case.

4 Plaintiff's claims should not be dismissed until he has counsel to help him in the discovery process as well, as how to answer the defendant's motions to dismiss.

5 Plaintiff has no legal assistance and does not understand the laws.

3/30/06

Christopher Orr